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Attorney for Defendant
JOEL CIRILO SOSA HERNANDEZ

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

HUGO RENE BAQUIAX,
JOEL CIRILO SOSA HERNANDEZ,
Defendants.

Case No. CR 11-00436-MRW-002

**DECLARATION OF JOEL
CIRILO SOSA HERNANDEZ IN
SUPPORT OF MOTION FOR
ORDER (1) SUPPRESSING ALL
EVIDENCE OBTAINED BY LAPD
FROM SEARCH CONDUCTED
PER WARRANT EXECUTED AT
THE 907 CLUB; OR
ALTERNATIVELY, (2)
PRECLUDING THE
GOVERNMENT'S USE OF SUCH
EVIDENCE AT TRIAL**

DATE: Oct 3, 2011

TIME: 3:00 p.m.

JUDGE: Hon. Michael R. Wilner

Defendant Joel Cirilo Sosa Hernandez ("Mr. Sosa"), by and through his undersigned counsel, hereby submits his Declaration in Support of Motion For Order (1) Suppressing All Evidence Obtained By LAPD From Search Conducted Per Warrant Executed At The 907 Club; Or Alternatively, (2) Precluding The

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**DECLARATION OF JOEL CIRILO
SOSA HERNANDEZ**

1 Government's Use Of Such Evidence At Trial, filed on September 4, 2011 (Docket
2 No. 32).

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4 Dated: October 5, 2011

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6 By: /s/
7 George L. Steele
8 Attorney for Defendant
9 JOEL CIRILO SOSA HERNANDEZ
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DECLARATION OF JOEL CIRILO SOSA HERNANDEZ

I JOEL CIRILO SOSA HERNANDEZ hereby state and declare as follows:

1. I am a defendant named in the Superseding Information in United States v. Baquiaux, et. al., case number CR 11-00436-MRW-002. I am charged with hiring and continuing to employ illegal aliens in violation of 8 USC 1324(a)(1)(A), (a)(2), and (f)(1).

2. During its investigation of this case, the government searched and seized numerous documents and items at the premises of the 907 Club, where I was employed, and where I had the title of "Assistant Manager."

3. The documents and computers seized were located in one of two offices of the 907 Club (hereinafter referred to as "the business office").

4. Only myself and three other managers had full access to the 907 Club building and two offices, and exercised managerial control over the day-to-day operations of the Club.

5. Only myself and three other managers had keys and access to the two offices located at the 907 Club, including the business office where the documents and computers were seized.

6. The door of the business office remained closed and locked during business hours. Other employees who were not one of the four managers, including the female dancers, were not permitted access to the business office.

7. All records and documents concerning the female employees and their employee files were maintained in file cabinets located within the business office. No other employee had access to these file cabinets. Only the managers had access to these file cabinets.

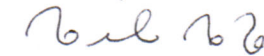
8. The computers were located in the 907 Club business office.

9. When female applicants or employees, or when the Confidential Informant in this case, arrived at the 907 Club to speak with a manager, the female would always speak with security at the door first. Security would call up to a manager and ask for permission for the female to enter the club and the business office. The female was never permitted to

1 enter the business office without the permission of a manager. The undercover video in this
2 case indicates this is true.

3 10. I make this declaration for the sole purpose of asserting my rights under the
4 Fourth Amendment and Title III, and I reserve my rights under the Fifth Amendment.

5 I declare the following under the penalty of perjury under the laws of the United
6 States of America the foregoing is true and correct. Executed this 5th day of October, 2011
7 in Pasadena, California.

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10 Joel Cirilo Sosa Hernandez, Declarant

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12 Translated by Estela Moll, certified
13 Spanish Interpreter.
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PROOF OF SERVICE

I, the undersigned, declare that I am a resident or employed in Los Angeles County, California; that my business address is the Law Offices of George L. Steele, 127 N. Madison Ave., Suite 24, Pasadena, CA 91101; that I am over the age of eighteen years; that I am not a party to the above-entitled action; that I am employed by the Law Offices of George L. Steele, who is a member of the Bar of the United States District Court for the Central District of California, and at whose direction I served the **DECLARATION OF JOEL CIRILO SOSA HERNANDEZ IN SUPPORT OF MOTION FOR ORDER (1) SUPPRESSING ALL EVIDENCE OBTAINED BY LAPD FROM SEARCH CONDUCTED PER WARRANT EXECUTED AT THE 907 CLUB; OR ALTERNATIVELY, (2) PRECLUDING THE GOVERNMENT'S USE OF SUCH EVIDENCE AT TRIAL.**

On October 11, 2011, following ordinary business practice, service was completed:

☒ (VIA ELECTRONIC SERVICE) I caused the foregoing document to be served electronically on all counsel following CM/ECF filing with the Court.

This proof of service is executed at Pasadena, California, on October 11, 2011.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Christina A. Hicklin

